

From: Marc Bowman [Marc.E.Bowman@mwhglobal.com]
Sent: Friday, November 15, 2013 3:23 PM
To: Rochlin, Kevin
Cc: Sheldrake, Beth; Greutert, Ed [USA]; Barbara Ritchie; Kelly Wright; susanh@ida.net; Bruce.Olenick@deq.idaho.gov; Douglas.Tanner@deq.idaho.gov; Scott.Miller@deq.idaho.gov; Jeff Hamilton; Marguerite Carpenter; David Heineck; Rob Hartman
Subject: RE: FMC Plant OU RDRA Monthly Report #4 - September 2013
Attachments: 2013-11-15 FMC Plant OU RDRA Order Monthly Report #5 - October 2013.pdf
Categories: 11-19 to 1-10 2014

Kevin:

Please find attached the FMC OU RDRA Monthly Report #5 for October 2013 as required under Paragraph 55 of the FMC Plant OU RDRA Unilateral Administrative Order reporting on the status of implementation of the Remedial Design / Remedial Action work. This report covers the time period from October 1 to October 31, 2013.

Marc Bowman
MWH Americas, Inc.
(801) 617-3234



Via email

November 15, 2013

Kevin Rochlin
Remedial Project Manager, Superfund Program
US EPA, Region 10
1200 Sixth Avenue
Seattle, WA 98101

RE: MONTHLY REPORT NO. 5 – OCTOBER 2013

FMC Operable Unit of the Eastern Michaud Flats Superfund Site
Unilateral Administrative Order for Remedial Design and Remedial Action
Docket No. CERCLA-10-2013-0116

Dear Mr. Rochlin,

This is the monthly report concerning the FMC Plant OU (the site) submitted pursuant to Paragraph 55 of the subject Unilateral Administrative Order for Remedial Design and Remedial Action (UAO), effective June 20, 2013. This report describes the time period between October 1, 2013 and October 31, 2013.

a) ACTIONS TAKEN DURING THE TIME PERIOD:

- Submitted deliverables (listed in item c below) and began preparation of deliverables (listed in item d below) as required based on the effective date of the subject UAO

b) SUMMARY OF SAMPLING RESULTS AND DATA RECEIVED DURING THE TIME PERIOD

- Pursuant to the *Field Modification # 1 to the Gamma Cap Performance Evaluation Work Plan* (as approved by EPA on October 1, 2013), sampling data was collected as follows during the field work performed during the week of October 7 through 11, 2013:
 - a. Pre- and post-construction gamma test cap survey results (topographic);
 - b. Field soil density (compaction) test for the two lifts placed at the gamma test cap;
 - c. High-pressure ionization chamber (HPIC) measurements on the gamma test cap; and
 - d. HPIC measurements in the Western Undeveloped Area.

The results/data and an evaluation of those data will be presented in the *Gamma Cap Performance Evaluation Report* that will be submitted within 45 days after completion of the field work (see item d below).

- Pursuant to the *Data Gap Work Plan* (DGWP) (as approved by EPA on October 22, 2013), sampling was collected as follows:
 - a. Test pit soil sampling as prescribed in Table 3.2 and Section 3.1.2 of the DGWP was performed on October 29 and 30, 2013;
 - b. Video surveying of the concrete underground storm sewer lines as prescribed in Section 3.3 of the DGWP was performed on November 6, 2013;
 - c. Soil boring sampling as prescribed in Table 3.2 and Section 3.1.2 of the DGWP was performed on November 12 and 13, 2013; and
 - d. Vegetation survey sampling as prescribed in Section 3.2 of the DGWP was performed on November 12 and 13, 2013.

The results/data and an evaluation of those data will be presented in the *Data Gap Investigation Report* that will be submitted within 45 days after completion of the field work or receipt of final material testing report(s) from the laboratory, whichever is later (see item d below).

- Pursuant to the *Interim CERCLA Groundwater Monitoring Plan*, groundwater samples were collected at the designated CERCLA groundwater wells on November 5 and 6, 2013. The results/data of the CERCLA groundwater monitoring will be reported in the *Interim CERCLA 2013 Groundwater Monitoring Report* to be submitted in April 2014.

c) PLANS, REPORTS AND OTHER DELIVERABLES SUBMITTED DURING THE TIME PERIOD

- Received EPA approval for 45 days to respond to the agency comments on the *Extraction Zone Hydrogeologic Study Work Plan* (HGWP) resulting in a submittal date of October 31, 2013.
- Received EPA approval to proceed with the *Field Modification #1* to the GCWP on October 1, 2013.
- On October 7, 2013, submitted the UAO Paragraph 39 notice of upcoming CERCLA groundwater monitoring pursuant to the *Interim CERCLA Groundwater Monitoring Plan*.
- Received additional comments on the DGWP from Booz, Allen, Hamilton (BAH) on October 9, 2013.
- On October 18, 2013, submitted a revised DGWP in response to BAH comments received on October 9, 2013.

- Received EPA approval of the DGWP on October 22, 2013 which contained an additional comment concerning the collection of a direct measure of holding capacity of the site soil.
- On October 29, 2013, submitted a response to the additional EPA comment received along with the approval of the DGWP. The response did not require revision of the DGWP.
- Received EPA, Shoshone-Bannock Tribes, and IDEA comments on the *Remedial Design Work Plan* (RDWP) on October 28, 2013.
- On October 31, 2013, submitted responses to agency comments received on the *Extraction Zone Hydrogeologic Study Work Plan* (HGWP) which included proposed revisions to the HGWP based upon those response to agency comments
- On November 11, 2013, submitted the response to agency comments and a revised *Remedial Design Work Plan* (RDWP) within 14 days of receipt of agency comments on October 28, 2013.

d) ACTIONS SCHEDULED FOR THE NEXT TWO MONTHS

- Implementation of the DGWP (as approved by EPA on October 22, 2013) field work began on October 29, 2013 and was completed on November 13, 2013
- Prepared and submitted responses to agency comments on the RDWP and submitted the revised RDWP on November 11, 2013.
- Prepare and submit the *Gamma Cap Performance Evaluation Report* by November 25, 2013 (45 days after completion of the test gamma cap field measurements).
- Prepare and submit the *Data Gap Investigation Report* that will be submitted within 45 days after completion of the field work or receipt of final material testing report(s) from the laboratory, whichever is later.
- Begin the 4th quarter interim CERCLA groundwater monitoring on November 4, 2013 as specified in the "28-day notification" as submitted on October 7, 2013 pursuant to UAO Paragraph 39. CERCLA groundwater monitoring was completed on November 6, 2013.

e) UNRESOLVED DELAYS ENCOUNTERED OR ANTICIPATED THAT MAY AFFECT THE SCHEDULE FOR IMPLEMENTATION OF WORK AND EFFORTS TO MITIGATE

- There are currently no unresolved delays encountered or anticipated, actual and anticipated modifications to the schedule are described in item f below.

f) MODIFICATIONS TO WORK PLANS OR SCHEDULES PROPOSED

- EPA's comment No. 11 on the RDWP states "EPA review may take as long as 60 days to ensure participation of all the stakeholders." The updated RD/RA Preliminary Schedules for soil and groundwater remedies were submitted as Tables 6.1 and 6.2 in the revised RDWP (as submitted on November 11, 2013) based on actual milestones through November 8, 2013, revised planned schedule, and a 60 calendar day (44 business days) EPA review period for deliverables. These schedules have not changed since that November 11, 2013 submittal, and therefore are not being submitted with this monthly report.

To the extent that extended periods for EPA and stakeholder review of documents that have been experienced to date are in excess of 60 days, coupled with the inclusion of a 60 calendar day review for all future deliverables, has prolonged design development such that construction of the soil remedy would not commence until 2015. FMC will develop, as separate critical path deliverables, the site-wide grading and storm water management design submittals (i.e., 30% and Pre-Final and Final engineering design submittals). With timely EPA review and approval of these design submittals, site grading should commence during the 2014 construction season. Site-wide grading that creates an integrated stormwater management system is a required precursor to cap construction and is otherwise independent of and does not prejudice the final cap designs (i.e., gamma and ET caps). A schedule for these critical path deliverables will be attached to the *November RD/RA Monthly Report* which will be submitted on December 16, 2013.

- The preliminary schedule for the groundwater remedy has been adjusted to reflect receipt of all agency comments on the HGWP on September 16, 2013. The schedule has been revised to reflect submittal of responses to agency comments on October 31, 2013 and a forecast of EPA approval on approximately November 20, 2013. To the extent that implementation of the HGWP (based on the scope initially proposed in FMC's July 15, 2013 draft) would be expected to require 75 days of field work, commencement of this work at the close of the Pocatello construction season is not feasible. Thus, the schedule for field implementation of the Extraction Zone Hydrogeologic (EZH) Study Work Plan has been shifted to begin on or about March 15, 2014 to perform the work with reasonable weather conditions (i.e., not during December – February).

If you have any questions concerning the monthly report, please feel free to call Marc Bowman at (801) 617-3234, Rob Hartman at (801) 617-3256, or Barbara Ritchie at (215) 299-6700.

Sincerely,



Marc Bowman
Project Director
MWH Americas, Inc.



Rob Hartman
RD Manager
MWH Americas, Inc.

cc: (as required under the UAO and as directed by EPA)

Bruce Olenick, IDEQ

Doug Tanner, IDEQ

Scott Miller, IDEQ

Kelly Wright, Shoshone-Bannock Tribes

Susan Hansen, Shoshone-Bannock Tribes